UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JIMMY LYONS, et al., individually and on behalf of all others similarly situated,

No. 13 Civ. 513 (ALC)

ECF Case

Plaintiffs,

VS.

LITTON LOAN SERVICING LP, et al.,

Defendants.

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and declaration of Frank G. Burt dated February 20, 2015, defendants Assurant, Inc., American Security Insurance Company, and Standard Guaranty Insurance Company, by and through undersigned counsel, will move in the above-captioned action before the Honorable Andrew L. Carter, Jr., United States District Judge, on a date and at a time to be determined by the Court, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, for the entry of an order dismissing, with prejudice, the (potentially) litigable claims of Frances and Johnnie Erving, and granting such other and further relief as may be just and equitable.

New York, New York Dated: February 20, 2015

SULLIVAN & WORCESTER LLP

By: /s/ Andrew T. Solomon Andrew T. Solomon (AS-9200) 1633 Broadway 32nd Floor New York, New York 10019

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